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November 9, 2001

Arizona Corporation Commission DOCKETED

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Docket Control **Arizona Corporation Commission** 1200 West Washington Street Phoneix, AZ 85007

Re:

Docket No. T-03940A-00-0771; Decision No. 64178 - LightSource

Telecom I, LLC 's Request for Extension of Time

Dear Mr. McNeil:

By this letter, LightSource Telecom I, LLC ("LightSource" or "Company") respectfully requests an extension of time to file documentation in compliance with the Arizona Corporation Commission's ("Commission") Order in the above referenced docket. By way of background, on October 30, 2001, the Commission granted LightSource conditional authority to provide competitive facilities-based and resold local exchange, interexchange and exchange access telecommunications services. On November 2, 2001, the Manager of the Compliance and Enforcement, Utilities Division, Patrick Williams, sent a letter titled "Notice of Compliance" to LightSource indicating five (5) compliance actions required by the Commission in its Order granting conditional authority.

LightSource employs a facilities-based strategy that requires close coordination with new home builders and the Company's build-out planning does not commence until after it receives its CPCN authority in any given market. Accordingly, LightSource is currently in the initial stages of planning its network in Arizona and is many months from its first customer turn-up date. Because of this lag time, LightSource has not yet identified the specific locations it will serve or finalized an interconnection agreement for the market. For these reasons, the Company is not yet in a position to comply with the post-certification compliance actions related to Directory Assistance and 911 certification in an operationally meaningful manner. Similarly, LightSource has not yet completed the research required to establish the rates it will tariff in the state and consequently any tariff filed at this time would need to be revised significantly before the first customer service date. Finally, LightSource does not collect deposits from its customers

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elsewhere in the country and has no intention of collecting deposits in Arizona and thus the bond requirement will serve little practical function even when the Company does begin service in Arizona.

It is for these reasons that LightSource respectfully requests that the Commission grant LightSource an extension of time to submit its 911 plan, its plan to have customers' telephone numbers included in the ILEC's directory and directory assistance databases, its compliance tariffs and its proof of a performance bond until thirty (30) days prior to LightSource's provision of local exchange service in the State of Arizona. In the alternative, LightSource would welcome any extension of time that the Commission believes is appropriate in the present circumstances. Because LightSource does not yet have any customers in Arizona at this time, the Company believes that the public convenience will in no way be impacted by a grant of an extension of time in these matters.

Enclosed please find an original and eleven (11) copies of this filing. Please date-stamp and return the extra copy in the enclosed prepaid envelope. Should you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

James Moskowitz

Senior Counsel - Regulatory Affairs

Patrick C. Williams, Manager, Compliance and Enforcement, ACC